

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

PRESIDENT AND FELLOWS OF
HARVARD COLLEGE,

Plaintiff,

v.

UNITED STATES DEPARTMENT OF
HEALTH AND HUMAN SERVICES;
NATIONAL INSTITUTES OF HEALTH;
ROBERT F. KENNEDY, JR., in his official
capacity as Secretary of the United States
Department of Health and Human Services;
UNITED STATES DEPARTMENT OF
JUSTICE; PAMELA J. BONDI, in her
official capacity as Attorney General of the
United States; UNITED STATES
DEPARTMENT OF EDUCATION; LINDA
M. MCMAHON, in her official capacity as
Secretary of the United States Department of
Education; UNITED STATES GENERAL
SERVICES ADMINISTRATION; STEPHEN
EHIKIAN, in his official capacity as Acting
Administrator of the United States General
Services Administration; UNITED STATES
DEPARTMENT OF ENERGY;
CHRISTOPHER A. WRIGHT, in his official
capacity as Secretary of the United States
Department of Energy; UNITED STATES
NATIONAL SCIENCE FOUNDATION;
SETHURAMAN PANCHANATHAN, in his
official capacity as Director of the United
States National Science Foundation; UNITED
STATES DEPARTMENT OF DEFENSE;
PETER B. HEGSETH, in his official capacity
as Secretary of the United States Department
of Defense; NATIONAL AERONAUTICS
AND SPACE ADMINISTRATION; JANET
E. PETRO, in her official capacity as Acting
Administrator of the National Aeronautics
and Space Administration; UNITED STATES
DEPARTMENT OF AGRICULTURE;
BROOKE L. ROLLINS, in her official

Civil Action No. 1:25-cv-11048-ADB

capacity as Secretary of Agriculture; UNITED STATES DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT; and SCOTT TURNER, in his official capacity as Secretary of Housing and Urban Development,

Defendants.

ASSENTED-TO MOTION FOR LEAVE TO FILE BRIEF OF *AMICI CURIAE* 12,041 HARVARD ALUMNI IN SUPPORT OF PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT

Pursuant to Local Rule 7.1(b)(3), proposed *amici curiae* 12,041 Harvard Alumni respectfully request leave to file the attached brief in support of Plaintiff's motion for summary judgment (the "Brief"). In support of this motion, proposed *amici curiae* state as follows:

1. The 12,041 Harvard alumni who have signed onto the Brief are listed in Appendix A by name, degree, and year of graduation. *Amici* are graduates of Harvard's Faculty of Arts and Sciences—including graduates of Radcliffe College before it merged with Harvard—as well as Harvard's schools of Business, Dental Medicine, Design, Divinity, Education, Engineering, Extension, Government, Law, Medicine, and Public Health. Many Harvard alumni remain active members of the Harvard community. Movants span multiple generations and include individuals from the graduating classes of every single year from 1950 to 2025.

2. The Court has discretion to permit the filing of *amicus curiae* briefs. *See Bos. Gas Co. v. Century Indem. Co.*, Civ. Action No. 02-12062-RWZ, 2006 WL 1738312, at *1 n.1 (D. Mass. June 21, 2006) ("[C]ourts have inherent authority and discretion to appoint amici.").

3. The Brief will assist the Court in its consideration of the pending motion because Harvard alumni play a critical role in the university's governance and hold a unique perspective

on the importance of Harvard as an independent academic institution, as well as responsibility for maintaining its commitment to academic freedom, truth, and service to the world.

4. The proposed Brief, excluding the appendix, does not exceed ten pages in length.
5. All parties, through conference with counsel, have consented to the relief requested by this motion.

WHEREFORE, 12,041 Harvard Alumni respectfully request that this Court grant leave to file the Brief.¹

Dated: June 9, 2025

Anurima Bhargava*
 Harvard College Class of 1996
 Anthem of Us, LLC
 30 Bow Street
 Cambridge, MA 02138
 (617) 575-9001
 anurima@anthemofus.com

Marco Simons*
 Harvard College Class of 1997
 Law Office of Marco B. Simons
 6218 Georgia Ave NW Ste 1 #594
 Washington, DC 20011
 917-696-3304
 marcosimonslaw@gmail.com

Respectfully submitted,

/s/ Lauren Godles Milgroom
 Joel Fleming (BBO No. 685285)
 Harvard Law School Class of 2011
 Lauren Godles Milgroom (BBO No. 698743)
 Harvard Law School Class of 2017
 EQUITY LITIGATION GROUP LLP
 1 Washington Mall #1307
 Boston, MA, 02108
 (617) 468-8602
 jfleming@equitylitigation.com
 lmilgroom@equitylitigation.com

Attorneys for [Proposed] Amici Curiae 12,041 Harvard Alumni

**pro hac vice application forthcoming*

¹ *Amici* agreed to join the Brief by submitting their information through a dedicated form. With support from volunteers, counsel cross-checked a sampling of submissions against the Harvard alumni database and other sources to verify *amici*'s status as Harvard alumni.

LOCAL RULE 7.1 CERTIFICATION

I hereby certify that counsel for proposed *amici curiae* have conferred with counsel for the parties. All parties consent to the request for leave to file the Brief.

/s/ Lauren Godles Milgroom
Lauren Godles Milgroom (BBO No. 698743)

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants on the Notice of Electronic Filing (NEF) on June 9, 2025.

/s/ Lauren Godles Milgroom
Lauren Godles Milgroom (BBO No. 698743)